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100207

From: Robert S. Davis (BDAVIS)
To: KLOSE
Date: Tuesday, December 8, 1992 3:07 pm
Subject: STANDARD CHLORINE

Kate:

Thanks very much for the meeting notes and your concern regarding the area that will be slated for clean-up using the 33 (LOEL). I am still waiting for the map that Anne Hiller promised months ago in a phone conversation. At that time she stated that the LOEL and the NOEL areas were virtually identical.

It is BTAG's concern that the remediation would be based solely upon human health as is demonstrated by Table 1 where it states that "the LOEL is most appropriate; the NOEL is too stringent (when compared to human risks)." This seems to state that human health is the sole reason for remediation and BTAG believes that this simply is not so. In addition, the levels for aquatic protection may be adjusted downward as a result as well.

It is our position that the most-stringent numbers should be used to protect ecological resources and we will stand fast on that until we are supplied with the information that shows clearly that the less-stringent number is sufficiently protective. It is possible that the map that Anne Hiller promised will demonstrate that our concerns will be alleviated by the remediation as it is currently planned. We need assurance that both the main areas of contamination as well as the 'hotspot' areas of contamination are remediated.

I note in your memo to the file that Weston claims to have based the ecological risk assessment on an organism more sensitive than the vole. To the best of my recollection, this is the first mention of that and it would be very interesting to BTAG to know what that organism is.

In summary, we have two requests:

- 1) assurance (either by a map or statement) that the most reasonably ecologically protective remediation plan will prevail.
- 2) the identity and rationale of using an animal more sensitive than the meadow vole for the ecological risk assessment.

Neither of these requests should delay the continuation of the project as they can both be included in the FS.

Again, thank you for sending the memo and if you have any questions, please feel free to contact me.

Bob

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CC:

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